

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : CRIMINAL NO. 25-
v. : DATE FILED: _____
ELIZABETH LISCHAK : VIOLATION:
18 U.S.C. § 641 (theft of government
: funds)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Social Security Administration ("SSA"), an agency of the United States, administered certain government benefit programs, including the Disability Insurance Benefits ("DIB") program, pursuant to Title 42, United States Code, Sections 401-433, and the Supplemental Security Income ("SSI") program, pursuant to Title 42, United States Code, Sections 1381-1383f.

2. The DIB program, which was established to be self-financing, provided monthly cash benefits to those who qualify as "disabled," as that term was defined for the purposes of the Social Security Act. DIB were available if a person worked long enough and had a medical condition that prevented the individual from working for at least 12 months. These payments continued until the beneficiary reached full retirement age or until the individual died.

3. Defendant ELIZABETH LISCHAK's friend, identified herein as "G.K.," received DIB benefits from the SSA during his lifetime. No other individual was entitled to the

benefits designated for G.K., and the benefits were to be terminated upon G.K.'s death. The SSA provided these benefits through an electronic funds transfer to a bank account held in the name of G.K.

4. G.K. died on or about February 1, 2021.

5. SSA had no record of timely notification of G.K.'s death and continued to issue DIB benefits through an electronic funds transfer to G.K.'s bank account.

6. Defendant ELIZABETH LISCHAK failed to disclose G.K.'s death to SSA so that payments to G.K. would continue.

7. From in or about March 2021 through in or about November 2024, the SSA disbursed approximately \$82,782 in SSA disability benefits for G.K. by electronic funds transfer into a bank account in the name of G.K. During this period, defendant ELIZABETH LISCHAK improperly converted to her own use approximately \$82,782 in SSA benefit payments intended for G.K.

8. Beginning in or about March 2021 and continuing through in or about November 2024, in the Eastern District of Pennsylvania, and elsewhere, defendant

ELIZABETH LISCHAK

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$82,782.00 in SSA benefits to which the defendant knew she was not entitled.

In violation of Title 18, United States Code, Section 641.



DAVID METCALF
UNITED STATES ATTORNEY

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 641, set forth in this information, defendant

ELIZABETH LISCHAK

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$82,782.00.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 981(a)(1)(C).

A handwritten signature in blue ink, appearing to read "Christine E. Ayler" followed by a stylized flourish.

DAVID METCALF
UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

ELIZABETH LISCHAK

INFORMATION

Count
18 U.S.C. § 641 (theft of government funds)

A true bill.

Foreperson

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Foreperson

Bail, \$ _____
